

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STATE OF NEW YORK, *et al.*,

Plaintiffs,

v.

DONALD J. TRUMP, IN HIS OFFICIAL
CAPACITY AS PRESIDENT OF THE UNITED
STATES, *et al.*,

Defendants.

Case No. 1:25-cv-1144 (JAV)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, Plaintiffs the State of New York, Arizona, California, Colorado, Connecticut, Delaware, Hawaii, Illinois, Maine, Maryland, Massachusetts, Minnesota, Nevada, New Jersey, North Carolina, Oregon, Rhode Island, Vermont, and Wisconsin, will move this Court before the Honorable Jeannette A. Vargas, United States District Judge, at the United States Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York, 1007, on a date set by the Court, for an order pursuant to Local Rule 6.3: (i) granting reconsideration of the Court's zone-of-interests ruling in its February 21 Opinion; (ii) holding that the States satisfy the zone-of-interests test with respect to the Privacy Act and the E-Government Act; (iii) holding that the States are likely to succeed on the merits of their APA claims that Defendants' Engagement Plan is contrary to these statutes; and (iv) amending the February 21 Opinion accordingly.

Dated: New York, New York
March 7, 2025

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